

UNITED STATES DISTRICT COURT
DISTRICT OF NORTH DAKOTA
NORTHWESTERN DIVISION

Tioga Townhomes, LLC,)	
)	Civil No.:
Plaintiff,)	
)	
vs.)	
)	
Auto-Owners Insurance Company,)	
)	
Defendant)	

NOTICE OF REMOVAL

TO: THE CLERK OF THE ABOVE COURT, PLAINTIFF, AND ITS COUNSEL OF RECORD, RONALD J. KNOLL AND ANN E. MILLER, FARGO, NORTH DAKOTA:

Notice is hereby given pursuant to Title 28, U.S.C., § 1446, that the Defendant, Auto-Owners Insurance Company, hereby removes this action from the State District Court of Williams County, North Dakota, to the United States District Court, District of North Dakota, Northwestern Division. The grounds for removal are as follows:

1. That Auto-Owners Insurance Company is a defendant in a civil action brought against it in the District Court, State of North Dakota, County of Williams. A copy of the summons and complaint that was served upon the defendant in this action are filed in connection herewith.
2. That this action was commenced against Auto-Owners Insurance Company on or after August 11, 2014, as shown by the attached Summons and Complaint of the same date.
3. That the controversy between the plaintiff and the defendant is a controversy between a citizen of the State of North Dakota on the one hand and a citizen of the State of Michigan on the other. At the time of the service of the summons and complaint upon the defendant, and now, the defendant was, and now is, a corporation duly organized and existing under and by virtue of the laws of the State of Michigan, with its principal place of business and home office in Lansing, Michigan. The plaintiff was

and is a citizen of the State of North Dakota, and therefore, there exists at this time a complete diversity of citizenship between the parties hereto.

4. That upon information and belief the amount in controversy between the parties exceeds the sum of \$75,000.00, exclusive of interest and costs, by virtue of the allegations in plaintiff's complaint and the plaintiff's demands in this case.
5. That this is a civil action brought in the State Court of North Dakota, of which the United States District Courts have original jurisdiction because of diversity of citizenship and amount in controversy.

WHEREFORE, the defendant prays that this case proceed in this court as an action properly removed thereto.

DATED this 27th day of August, 2014.

/s/ *Michael J. Morley*
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